

CHRISTOPHER CHIOU  
United States Attorney  
District of Nevada  
Nevada Bar Number 14853  
MELANEE SMITH  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
PHONE: (702) 388-6336  
Melanee.Smith@usdoj.gov  
*Attorneys for the United States of America*

FILED.

DATED: 12:55 pm, October 18, 2021

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GIOVANI BARBOZA,

JORDAN VILLALOBOS, and

FRANCISCO RAMIREZ SORTO,

Defendants.

**CRIMINAL COMPLAINT**

Case No.: 2:21-mj-00865-DJA

**VIOLATIONS:**

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi), and 846  
– Conspiracy to Distribute a Controlled  
Substance

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi) –  
Distribution of a Controlled Substance

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi) –  
Possession with Intent to Distribute a Controlled  
Substance

18 U.S.C. § 924(c)(1)(A)(i) – Possession of a  
Firearm During and in Relation to a Drug  
Trafficking Crime

18 U.S.C. § 2 – Aiding and Abetting

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
Complainant, being duly sworn, deposes and states:

**COUNT ONE**

(Conspiracy to Distribute a Controlled Substance)  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi), and 846)

Beginning from a date unknown and continuing up to and including on or about October 15, 2021, in the State and Federal District of Nevada,

**GIOVANI BARBOZA,  
JORDAN VILLALOBOS, and  
FRANCISCO RAMIREZ SORTO,**

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other persons known and unknown, to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi) and 846.

**COUNT TWO**

(Distribution of a Controlled Substance)  
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi); 18 U.S.C. § 2)

On or about September 15, 2021, in the State and Federal District of Nevada,

**GIOVANI BARBOZA and  
JORDAN VILLALOBOS,**

the defendants herein, aiding and abetting one another, did knowingly and intentionally distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi) and Title 18, United States Code, Section 2.

**COUNT THREE**

(Possession of a Firearm During and in Relation  
to a Drug Trafficking Crime)  
(18 U.S.C. § 924(c)(1)(A)(i))

On or about September 15, 2021, in the State and Federal District of Nevada,

**GIOVANI BARBOZA**

defendant herein, during and in relation to the drug trafficking crime charged in Count Two of

1 this Complaint, knowingly and intentionally carried and used a firearm, that is a handgun, all  
2 in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT FOUR**

3 (Distribution of a Controlled Substance)  
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi); 18 U.S.C. § 2)

4 On or about September 29, 2021, in the State and Federal District of Nevada,

5 **GIOVANI BARBOZA and**  
**JORDAN VILLALOBOS,**

6 the defendants herein, aiding and abetting one another, did knowingly and intentionally  
7 distribute 40 grams or more of a mixture and substance containing a detectable amount of N-  
8 phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (fentanyl), a Schedule II controlled  
9 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi)  
and Title 18, United States Code, Section 2.

**COUNT FIVE**

10 (Possession with Intent to Distribute a Controlled Substance)  
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi))

11 On or about October 15, 2021, in the State and Federal District of Nevada,

12 **GIOVANI BARBOZA**

13 defendant herein, did knowingly and intentionally possess with the intent to distribute 40 grams  
14 or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II  
15 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(B)(vi).

**COUNT SIX**

16 (Possession of a Firearm During and in Relation  
17 to a Drug Trafficking Crime)  
(18 U.S.C. § 924(c)(1)(A)(i))

18 On or about October 15, 2021, in the State and Federal District of Nevada,

19 **GIOVANI BARBOZA**

1 defendant herein, during and in relation to the drug trafficking crime charged in Count Five of  
2 this Complaint, knowingly and intentionally possessed a firearm, that is a handgun, all in  
violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

3 **COUNT SEVEN**

(Possession with Intent to Distribute a Controlled Substance)  
4 (21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi))

5 On or about October 15, 2021, in the State and Federal District of Nevada,

6 **JORDAN VILLALOBOS**

7 defendant herein, did knowingly and intentionally possess with the intent to distribute 40 grams  
8 or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II  
controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(B)(vi).

9 **COUNT EIGHT**

(Possession of a Firearm During and in Relation  
10 to a Drug Trafficking Crime)  
(18 U.S.C. § 924(c)(1)(A)(i))

11 On or about October 15, 2021, in the State and Federal District of Nevada,

12 **JORDAN VILLALOBOS**

13 defendant herein, during and in relation to the drug trafficking crime charged in Count Seven  
14 of this Complaint, knowingly and intentionally possessed a firearm, that is a handgun, all in  
violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

15 **COUNT NINE**

(Possession with Intent to Distribute a Controlled Substance)  
16 (21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi))

17 On or about October 15, 2021, in the State and Federal District of Nevada,

18 **FRANCISCO RAMIREZ SORTO**

19 defendant herein, did knowingly and intentionally possess with the intent to distribute 40 grams  
or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II

1 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
2 841(b)(1)(B)(vi).

**COUNT TEN**

3 (Possession of a Firearm During and in Relation  
4 to a Drug Trafficking Crime)  
(18 U.S.C. § 924(c)(1)(A)(i))

5 On or about October 15, 2021, in the State and Federal District of Nevada,

**FRANCISCO RAMIREZ SORTO**

6 defendant herein, during and in relation to the drug trafficking crime charged in Count Nine of  
7 this Complaint, knowingly and intentionally possessed a firearm, that is a handgun, all in  
8 violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**PROBABLE CAUSE AFFIDAVIT**

9 1. I, Michael D. Downs, have been employed as a Special Agent (SA) with the  
10 Drug Enforcement Administration (DEA) since March 2020. Prior to employment by the  
11 DEA, I was employed as a police officer with Sandy City, Utah for approximately seven (7)  
12 years. I am currently assigned to the DEA Las Vegas District Office's (LVDO) Clark County  
13 Gang Task Force (CCGTF). The CCGTF is comprised of detectives from the Las Vegas  
14 Metropolitan Police Department (LVMPD), North Las Vegas Police Department (NLVPD),  
15 in addition to Special Agents from the DEA. The CCGTF is primarily responsible for  
16 conducting investigations into violent, gang-based organizations operating in Las Vegas,  
Nevada. In addition, the CCGTF investigates organizations and individuals involved in illicit  
firearms trafficking.

17 2. I have attended training pertaining to narcotics identification and investigation.  
18 I have completed training courses in drug recognition, undercover operations, narcotics  
19 distribution, criminal narcotics trafficking organizations, search and seizure, and others

1 pertaining to the aforementioned offenses currently being investigated. My experience in the  
2 DEA, along with prior employment, has involved, among other things: (1) the debriefing of  
3 defendants, witnesses and informants, to include those who have knowledge of the  
4 distribution and transportation of controlled substances and of the laundering and  
5 concealment of proceeds of drug trafficking; (2) surveillance; (3) analysis of documentary and  
6 physical evidence; (4) the hand-to-hand purchase of controlled substances; and (5) the  
7 execution of search warrants. I am familiar with the manner in which narcotics traffickers  
8 conduct their drug-related businesses, including: the methods employed by narcotics  
9 traffickers to import and distribute narcotics, their use of cellular telephones in furtherance of  
10 their illegal activities and their use of coded language to refer to narcotics, drug proceeds,  
11 counter-surveillance and other aspects of narcotics trafficking.

12 3. The following facts come from my personal observations, my training and  
13 experience, information obtained from other law enforcement agents, and witnesses. I have  
14 not included every fact known to me concerning this investigation, but have only included those  
15 facts sufficient to establish a finding of probable cause. All times noted are approximate.

#### 16 **FACTS ESTABLISHING PROBABLE CAUSE**

17 4. The CCGTF and the Bureau of Alcohol, Tobacco, Firearms, and Explosives  
18 (ATF) have been conducting an investigation into Giovanni BARBOZA, Jordan  
19 VILLALOBOS, and Francisco Ramirez SORTO, members of the Las Vegas based street  
gang Money Makin' Moves (MMM). The DEA and ATF have conducted two (2)  
undercover purchases of counterfeit pills containing fentanyl from BARBOZA and  
VILLALOBOS.

5. On September 15, 2021 DEA Special Agent Joseph Maroney, acting in an  
undercover capacity (UC), made contact with BARBOZA via telephone and arranged to

1 purchase three thousand (3000) counterfeit pills containing fentanyl. In anticipation of the  
2 transaction, agents established surveillance outside a single-family home near the intersection  
3 of West Lake Mead Blvd and North Tenaya Way, known to be BARBOZA, VILLALOBOS  
4 and SORTOS' residence. The UC arrived in a public parking lot near the residence and  
5 contacted BARBOZA to advise him of his location. A short time later, Task Force Officer  
6 (TFO) Brian Sachs observed VILLALOBOS and BARBOZA exit the residence. BARBOZA  
7 was observed carrying a plastic bag. VILLALOBOS and BARBOZA entered a black Cadillac  
8 and drove directly to the UC's location. BARBOZA then walked over and got into the UC's  
9 vehicle. Upon entering the UC's vehicle, the UC immediately noticed a gun that was visible  
10 in BARBOZA's front waistband. BARBOZA then made the statement, "I've got my shit you  
11 feel me." The UC stated he understood and then BARBOZA provided the UC with three  
12 thousand (3000) blue colored pills. In exchange, the UC provided BARBOZA with \$9,000.  
13 BARBOZA and VILLALOBOS then drove directly back to their residence. The pills were  
14 sent to the DEA's Southwest Laboratory for testing and analysis, and were found to weigh  
15 313 grams and contain fentanyl.

12           6.       On September 29, 2021, the UC contacted BARBOZA and negotiated the  
13 purchase of two thousand (2000) counterfeit pills containing fentanyl. In anticipation of the  
14 transaction, agents again established surveillance outside of his residence. Upon arriving at  
15 the agreed upon meeting location, the UC contacted BARBOZA and advised BARBOZA  
16 that he was there. TFO Tyler Andrus then observed BARBOZA and VILLALOBOS exit  
17 their residence and depart in a red Chevrolet Camaro. BARBOZA was observed as the driver  
18 and VILLALOBOS was observed as the passenger. BARBOZA and VILLALOBOS drove  
19 directly to the UC's location and parked next to the UC's vehicle. BARBOZA then got into  
the front passenger seat of the UC's vehicle and provided the UC with approximately two

1 thousand (2000) pills in exchange for \$6000. The pills were sent to the DEA's Southwest  
2 Laboratory for testing and analysis, and were found to weigh 210 grams and contain fentanyl.

3 7. On September 23, 2021, CCGTF agents were conducting surveillance of the  
4 residence shared by BARBOZA, VILLALOBOS and SORTO. At approximately 2:00 p.m.,  
5 agents observed BARBOZA and SORTO get into a red Camaro and depart the area. Agents  
6 maintained constant surveillance as BARBOZA and SORTO drove to a residence near the  
7 intersection of North Lamb Boulevard and East Washington Avenue, where they arrived at  
8 approximately 2:37 p.m. TFO Tyler Andrus observed BARBOZA park the red Camaro in  
9 the back parking lot. At approximately 2:39 p.m., TFO James Keen observed the Camaro  
10 leaving from the parking lot. Based on my training and experience and information received  
11 from SA Shane Nestor, who has conducted narcotics investigations in the Las Vegas area for  
12 eleven (11) years, I know this area to be a high crime area with a history of narcotics  
13 trafficking. This information coupled with my knowledge of the investigation and this  
14 lengthy drive for a quick stop, gives reason to believe that BARBOZA and SORTO traveled  
15 from their residence to this location to conduct a narcotics transaction.

16 8. On the same date, at approximately 5:13 p.m., SA Nestor observed SORTO  
17 exit from his residence. SORTO walked to the intersection of Old Mission Drive and Villa  
18 Vista Way. At approximately 5:14 p.m., SA Nestor observed SORTO on the phone. At  
19 approximately 5:15 p.m., SA Nestor observed a red Chevrolet sedan pull up next to SORTO.  
SA Nestor observed SORTO reach into the passenger side window and conduct a quick hand  
to hand exchange with the person in the front passenger seat before the red Chevrolet sedan  
departed the area. SA Nestor recognized this quick interaction to be consistent based on his  
training and experience as a "hand to hand" transaction of narcotics.



1           9.       On October 8, 2021, United States Magistrate Judge, the Honorable Brenda  
2       Weksler, authorized a warrant to search the residence shared by VILLALOBOS, BARBOZA  
3       and SORTO. That warrant was executed on October 15, 2021. During the execution of the  
4       warrant, BARBOZA and SORTO were found inside the residence. VILLALOBOS was  
5       located in his vehicle just outside the residence. The residence has (4) four bedrooms. In the  
6       bedroom belonging to BARBOZA, agents recovered seven (7) handguns and three (3) clear  
7       plastic bags that contained approximately three thousand (3000) blue pills. The pills found in  
8       BARBOZA's bedroom are consistent with the pills purchased by the UC previously. They are  
9       blue in color and have an "M" stamped on one side and a "30" stamped on the other. Based  
10      on my training and experience these pills are consistent with counterfeit Oxycodone pills  
11      containing fentanyl. Further, a pair of men's pants were found on the floor of the bedroom  
12      and inside the pants was a cellular telephone with the same telephone number the UC used to  
13      contact BARBOZA.

14           10.     In the bedroom belonging to VILLALOBOS, agents recovered a Colt 1911  
15      handgun and four (4) clear plastic bags containing approximately three thousand (3000) pills.  
16      These pills are consistent with the pills purchased by the UC previously. They are blue in  
17      color and have an "M" stamped on one side and a "30" stamped on the other. Based on my  
18      training and experience these pills are consistent with counterfeit Oxycodone pills containing  
19      fentanyl. Further, a Nevada Department of Public Safety Reference Form bearing  
20      VILLALOBOS' name was found in the bedroom.

21           11.     In the bedroom belonging to SORTO, agents recovered a Walther .22 caliber  
22      handgun and one (1) clear plastic bag containing approximately one thousand (1000) pills.  
23      These pills are consistent with the pills purchased by the UC previously. They are blue in  
24      color and have an "M" stamped on one side and a "30" stamped on the other. Based on my

1 training and experience these pills are consistent with counterfeit Oxycodone pills containing  
2 fentanyl. Further, a work identification card bearing SORTO's name and photograph was  
found in this bedroom.

3 12. Based on the foregoing facts and information, I submit that there is probable  
4 cause to believe that Giovani BARBOZA, Jordan VILLALOBOS, and Francisco Ramirez  
5 SORTO, did commit violations of Title 21, United States Code, Sections 841(a)(1),  
6 841(b)(1)(A)(vi), and 846; Title 21, United States Code, Sections 841(a)(1) and  
7 841(b)(1)(B)(vi); Title 18, United States Code, Section 924(c)(1)(A)(i); and Title 18, United  
States Code, Section 2.



Michael D. Downs  
Special Agent  
Drug Enforcement Administration

12 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 41 by telephone  
on \_\_\_ October 18 \_\_, 2021.



HONORABLE DANIEL ALBREGTS  
UNITED STATES MAGISTRATE JUDGE